

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

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UNITED STATES OF AMERICA,

Plaintiff,

-against-

Crim. No. 16-181(JLL)

QUAWEE JONES,

Defendant.

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TO: Robert Frazer, AUSA  
Josh Hafetz, AUSA  
United States Attorney's Office  
970 Broad Street, Rm. 700  
Newark, NJ 07102

PLEASE TAKE NOTICE that on a date set by the Court, the undersigned attorney for the defendant Quawee Jones, will move before the Honorable Jose L. Linares, U.S.D.J., for an Order granting the following relief:

1. A Bill of Particulars;
2. Suppression of evidence obtained from wiretaps;
3. Dismiss the superseding indictment because it charges two or more distinct conspiracies in one count;
4. The immediate production of expert reports;
5. The immediate production of Brady and Giglio materials;
6. Requiring the government to preserve rough notes taken during the course of the joint state and federal investigation;
7. Early production of Jencks materials;
8. The immediate production of Rule 16(a)(1) evidence;

9. Early production of co-conspirator's statements;
10. To determine admissibility and audibility of recorded statements;
11. Immediate identification of confidential informants;
12. Immediate disclosure of 404(b) evidence;
13. Permission for Jones to join in applicable motions made by co-defendants; and
14. Permission for Jones to file any necessary, additional motions.

In support of this motion, defendant Quawee Jones will rely upon the annexed brief.

LAW OFFICES OF STEPHEN TURANO  
Attorneys of Defendant Quawee Jones

BY: /s/ Stephen Turano  
STEPHEN TURANO, ESQ.  
(ST 2052)

Dated: January 20, 2017